

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Gillman, Bruton & Capone, LLC  
Marc C. Capone, Esq.  
60 Highway 71, Unit 2  
Spring Lake Heights, NJ 07762  
Phone #732-528-1166

In Re:

Michelle Medler-Moran

Case No.: 19-25105

Judge: Christine M Gravelle

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Selene Finance/US Bank Trust, creditor,

A hearing has been scheduled for May 20, 2020, at 9:00am.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

I sent check no. 2053 in the amount of \$1,470.05 to Selene Finance last week. I will be able to send another full mortgage payment of \$1,363.44 next Friday, May 22. Due to the pandemic, I have been laid off from my job since March 17, 2020. My employer has indicated that the plan is for me to return to work sometime between May 15 and June 1. I would ask that the remaining arrears be placed into

☒ Other (**explain your answer**):

my Chapter 13 Plan. I will be able to resume making regular payments to Selene Finance starting June 2020.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 5/12/2020

/s/ Michelle Medler-Moran  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.